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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KELLY J. ANDERSON,
Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

Case No. 2:17-CV-01177-RFB-GWF

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL AND/OR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for one week from January 17, 2018 to **January 24, 2018**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel is taking leave, including on the date of the current filing deadline due an unanticipated family emergency. Additional time is required as Counsel has over 75 active pending matters, of which require 2+ responses to dispositive motions per week until mid-January. In addition, Counsel has three pending Ninth Circuit matters, which require

1 additional levels or review. Counsel apologizes for the belated nature of the request, but did not
2 expect to take unanticipated leave due to the family emergency. As such, Counsel respectfully
3 requests additional time to adequately review the transcript and properly respond to Plaintiff's Motion
4 for Summary Judgment. Defendant makes this request in good faith with no intention to unduly delay
5 the proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
6 accordingly.
7

8 Respectfully submitted,
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10 Dated: January 18, 2018

/s/ *Daniel Jones
(*as authorized by email on January 18, 2018)
DANIEL JONES
Attorney for Plaintiff

14 Dated: January 18, 2018

DAYLE ELIESON
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

18 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

21 **ORDER**

22 APPROVED AND SO ORDERED:
23

24
25 DATED: 1/18/2018


HON. GEORGE FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE